DOCKET SECTION

BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001 JAN 23 4 48 PM 198

RECEIVED

MODIAN METERS AND ACCOME

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO UNITED PARCEL SERVICE WITNESS SELLICK (USPS/UPS-T2-26-27)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to United Parcel Service witness Sellick: USPS/UPS-T2-26-27.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-2990; Fax -5402 January 28, 1998

USPS/UPS-T2-26. Please confirm that you do not provide testimony on the average weight of Priority mail pieces observed in IOCS, by shape, either in your direct testimony or in your workpapers. If not confirmed, please provide a reference, and explain how they were derived.

USPS/UPS-T2-27.

- a. Please confirm that the ODIS volumes reported in workpaper UPS-Sellick-1-III-A, page 2, are average daily volumes. If not confirmed, please explain fully.
- b. Please confirm that when multiplied by 302 delivery days, the aggregate ODIS volume estimates for Priority Mail are within 5% of the BY 96 Priority Mail volume. If not confirmed, please explain fully.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 January 28, 1998